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April 15, 2019

Hon. Lewis A. Kaplan  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re:** *United States v. Mamdouh Salim*  
**Case No.:** 98 Cr. 1023

Dear Judge Kaplan,

I am responding to your letter dated March 25, 2019 regarding my client Mr. Salim. I have had multiple conversations with the Government regarding the case and its current status. I spoke with one of the Assistants assigned to this matter to get an update prior to addressing the Court's concerns today. It is my understanding that the Government is scheduled to provide an update to the Court on May 9.

Unfortunately, due to the complexities of the case and the underlying situation, we do not have an answer from the Government yet. Since it has taken me time to familiarize myself with this matter, I am asking the Court to reserve any decision on counsel and allow me to continue representing Mr. Salim until we get a clear view from the Government as to how they will proceed. There is currently no legal issues which necessitate me to act on Mr. Salim's behalf. Therefore, I would ask the Court to defer any decision, and allow for continuity of representation to continue until the Government responds. Once we get the expected update from the Government, it might resolve all outstanding issues and foreclose a necessity to deal with representation issues.

I have tried, on a number of occasions, to orchestrate a phone conference with Mr. Salim to no avail. I have been told through Prison officials that Mr. Salim says he has new counsel. I have not received that information directly from him, nor have I been contacted by any counsel indicating that they are representing him. I am currently exploring CJA authorization to visit Salim at his facility in person.

I believe I am fulfilling my role in handling this matter up to this point. I want to remain his

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counsel and continue to monitor the situation. Once a decision is made, and a communication issue arises that will affect my ability to act, I will notify the Court and ask for a hearing on my client's behalf

If you need further information, or require an appearance to further discuss, please do not hesitate to contact me.

Respectfully submitted,

s/ Louis V. Fasulo

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